

LAW OFFICES OF SOOK H. LEE
Sook H. Lee (SBN 162307)
6565 N. MacArthur Blvd., Suite 225
Irving, Texas 75039
Tel: 214-918-7431
Fax: 214-624-5101
Email: sook.lee@shllaw.net

Attorneys for Plaintiff
YOU FIRST EXPRESS, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

| | | |
|---|---|-------------------------------------|
| YOU FIRST EXPRESS, INC., a California corporation, | } | Case No.: |
| Plaintiff, | | COMPLAINT FOR DAMAGES |
| vs. | | BREACH OF CONTRACT; |
| KUMHO TIRE U.S.A., INC., a Georgia corporation; WOO-HYUN JUNG, an individual, | | PROMISSORY ESTOPPEL; |
| Defendants. | | PROMISSORY FRAUD; AND COMMON COUNTS |

Plaintiff You First Express, Inc. alleges:

I.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1332(a)(1) because this action involves citizens of different states and the matter in controversy exceeds \$75,000, exclusive of interest and costs.

1 WHEREFORE, plaintiff You First Express, Inc. prays for judgment:

- 2 1. For damages in the principal amount of \$80,731.25 against defendants
3 Kumho Tire U.S.A., Inc. and Woo-Hyun Jung, jointly and severally;
4 2. For prejudgment interest accrued from September 12, 2023;
5 3. For the cost of suit herein; and
6 4. For such other and further relief as this Court deems just and proper;

7
8 Dated: January 17, 2024

LAW OFFICES OF SOOK H. LEE

9
10 By: /s/ Sook H. Lee
11 Sook H. Lee
12 Attorneys for Plaintiff
13 You First Express, Inc.
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EXHIBIT A

Bard

실험 버전

로그인

Question:

Can a trucking broker demand payment from the original contractor if the trucking company does not make payment?

Answer:

Yes, a trucking broker can demand payment from the original contractor if the trucking company does not make payment. In the United States, a trucking broker is a contractor who acts as an intermediary between the original contractor and the trucking company. The trucking broker receives the shipment from the original contractor and then contracts with the trucking company to transport the shipment. Once the shipment is completed, the trucking broker is entitled to be paid by the original contractor.

In your case, your company, YF, received the shipment from Zariz and then contracted with Granados to transport the shipment. The shipment was completed, but Zariz did not pay YF. Since Zariz did not pay YF, YF can demand payment from the original contractor, Kumho Tire.

Of course, Kumho Tire is not in a direct contractual relationship with YF. Therefore, YF must prove the following in order to demand payment from Kumho Tire:

- There is a transportation contract between YF and Zariz, and under that

Bard 사용해 보기

Best regards,

Gilbert (Kyu.W) Choi/CEO

Sent from Gmail Mobile

[Quoted text hidden]

Woohyun Jung <WJung@kumhotireusa.com>

Mon, Sep 11, 2023 at 5:37 AM

To: Inrak Lee <ILee@kumhotireusa.com>, "luke@yfe21.com" <luke@yfe21.com>, "gilbert@yfe21.com" <gilbert@yfe21.com>, "Heather (Saet Byul) Mo" <sbmo@kumhotireusa.com>

Cc: "gilbert@yfe21.com" <gilbert@yfe21.com>, "Heather (Saet Byul) Mo" <sbmo@kumhotireusa.com>, Taejung Yoon <tjyoon@kumhotireusa.com>, "Ken (Doseob) Kim" <dskim@kumhotireusa.com>, Seunggi Baek <sbaek@kumhotireusa.com>, Woohyun Jung <WJung@kumhotireusa.com>

Dear YFE Team

First of all, I am sorry about the payment delay issue from Zariz.

Can you provide the list of containers and provide payment amt? I will take to Zariz about the payment issue today , if we can not resolve we will pay directly to your company


In the meanwhile, can you provide W9, bank information (official bank letter)

Please help us move the containers ASAP .. One way the other we will pay directly to you or via Zariz.. We will assure you get paid.

Heather/Inrak/Baek

Please check the current lane what Zariz handle, start pull out if we can resolve this issue.. We might have to hold payment also



 Image result for nba logo

The Official Tire of NBA

Woo-Hyun Jung | Director of Logistics | Kumho Tire USA

133 Peachtree St. NE Suite 2800 Atlanta, GA 30303
Wjung@KumhoTireUSA.com |
<http://www.kumhotireusa.com/>
Ph +1 786 575 9104(Cell) | 678-916-3345 (Office)

 facebook icon  twitter icon  youtube icon 

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From: Luke Suzuki <luke@yfe21.com>

Sent: Tuesday, August 22, 2023 7:59 PM

To: Heather (Saet Byul) Mo <sbmo@kumhotireusa.com>; ZZ.Sey June Park <SPark@kumhotireusa.com>; Jae Hun Um <Jum@kumhotireusa.com>

Cc: Gilbert Choi(YFE) <gilbert@yfe21.com>

Subject: Kumho Container Imports - Shafner, CA / Rancho Cucamonga, CA / Ontario, CA

Hi Heather,

EXHIBIT B

YOU FIRST EXPRESS, INC.

31244 Palos Verdes Dr. West Suite 203

Rancho Palos Verdes, CA 90275

+1 3107075707

acct@yfe21.com

Statement

TO

Sarah Lund

Zariz Transport Inc.

7601 N Federal Hwy Ste 230B

Boca Raton, FL 33487-1668 USA

DATE: 9/12/2023**TOTAL DUE:** \$80,731.25

| Date | Transaction Type | No. | Customer Ref # | Due Date | Past Due | Amount | Open Balance |
|------------|------------------|-------------|----------------------------|------------|----------|----------|--------------|
| 07/26/2023 | Invoice | YFINV-19461 | SGN1874139 | 08/10/2023 | 33 | 1,025.00 | 1,025.00 |
| 07/26/2023 | Invoice | YFINV-19462 | SGN1874139 | 08/10/2023 | 33 | 1,025.00 | 1,025.00 |
| 07/26/2023 | Invoice | YFINV-19463 | SGN1874139 | 08/10/2023 | 33 | 1,025.00 | 1,025.00 |
| 07/31/2023 | Invoice | YFINV-19464 | SGN1874139 | 08/15/2023 | 28 | 1,000.00 | 1,000.00 |
| 07/31/2023 | Invoice | YFINV-19465 | SGN1874139 | 08/15/2023 | 28 | 1,225.00 | 1,225.00 |
| 08/01/2023 | Invoice | YFINV-19468 | MAEU228179682 | 08/16/2023 | 27 | 1,075.00 | 1,075.00 |
| 08/01/2023 | Invoice | YFINV-19469 | MAEU228179682 | 08/16/2023 | 27 | 1,075.00 | 1,075.00 |
| 08/01/2023 | Invoice | YFINV-19471 | MAEU228179682 | 08/16/2023 | 27 | 1,100.00 | 1,100.00 |
| 08/01/2023 | Invoice | YFINV-19472 | MAEU228179682 | 08/16/2023 | 27 | 1,100.00 | 1,100.00 |
| 08/01/2023 | Invoice | YFINV-19470 | MAEU228179682 | 08/16/2023 | 27 | 1,325.00 | 1,325.00 |
| 08/01/2023 | Invoice | YFINV-19467 | MAEU228179682 | 08/16/2023 | 27 | 1,075.00 | 1,075.00 |
| 08/01/2023 | Invoice | YFINV-19473 | SGN1874139 | 08/16/2023 | 27 | 1,100.00 | 1,100.00 |
| 08/08/2023 | Invoice | YFINV-19476 | SGN1874139 | 08/23/2023 | 20 | 1,150.00 | 1,150.00 |
| 08/08/2023 | Invoice | YFINV-19475 | SGN1874139 | 08/23/2023 | 20 | 1,243.75 | 1,243.75 |
| 08/09/2023 | Invoice | YFINV-19481 | TRHU4171206/TSXZ40 6840 | 08/24/2023 | 19 | 450.00 | 450.00 |
| 08/09/2023 | Invoice | YFINV-19482 | BSIU9695328/ TSXZ489416 | 08/24/2023 | 19 | 450.00 | 450.00 |
| 08/09/2023 | Invoice | YFINV-19490 | CMDUSGN1875748 | 08/24/2023 | 19 | 1,075.00 | 1,075.00 |
| 08/09/2023 | Invoice | YFINV-19479 | CMDUSGN1875748 | 08/24/2023 | 19 | 1,175.00 | 1,175.00 |
| 08/09/2023 | Invoice | YFINV-19480 | SGN1874139 | 08/24/2023 | 19 | 1,200.00 | 1,200.00 |
| 08/09/2023 | Invoice | YFINV-19485 | MAEU228179682 | 08/24/2023 | 19 | 1,250.00 | 1,250.00 |
| 08/09/2023 | Invoice | YFINV-19487 | MAEU228179682 | 08/24/2023 | 19 | 1,250.00 | 1,250.00 |
| 08/09/2023 | Invoice | YFINV-19488 | MAEU228179682 | 08/24/2023 | 19 | 1,250.00 | 1,250.00 |
| 08/09/2023 | Invoice | YFINV-19489 | MAEU228179682 | 08/24/2023 | 19 | 1,250.00 | 1,250.00 |
| 08/09/2023 | Invoice | YFINV-19486 | MAEU228179682 | 08/24/2023 | 19 | 1,275.00 | 1,275.00 |
| 08/10/2023 | Invoice | YFINV-19491 | CAAU6044026/FLXZ43 0187 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19492 | CMAU7790160/ HDMZ411286 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19493 | CAIU9429430/TSXZ41 7429 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19494 | NYKU4842460/MSCZ4 50835 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19495 | CMAU6206945/FLXZ4 33806 | 08/25/2023 | 18 | 450.00 | 450.00 |

YOU FIRST EXPRESS, INC.
 31244 Palos Verdes Dr. West Suite 203
 Rancho Palos Verdes, CA 90275
 +1 3107075707
acct@yfe21.com



Statement

TO
 Sarah Lund
Zariz Transport Inc.
 7601 N Federal Hwy Ste 230B
 Boca Raton, FL 33487-1668 USA

DATE: 9/12/2023
TOTAL DUE: \$80,731.25

| Date | Transaction Type | No. | Customer Ref # | Due Date | Past Due | Amount | Open Balance |
|------------|------------------|-------------|-----------------------------|------------|----------|--------|--------------|
| 08/10/2023 | Invoice | YFINV-19496 | TLLU5687154/APMZ41 4820 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19497 | NYKU0845497/MSCZ4 52879 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19498 | GCXU5398754/MSCZ4 53720 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19499 | FSCU8570333/TSXZ42 3397 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19500 | CMAU7701270/TSXZ4 88371 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19501 | CMAU4817170/TSXZ4 05303 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19502 | KKFU8070609/FLXZ42 9260 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19503 | FFAU2099739/OESZ80 3734 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19504 | EMCU8771932/EMCZ 5415227 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19505 | TGBU7152973/TSXZ49 8961 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19506 | OOLU8724680/FVKZ1 01272 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19507 | PONU8259781/TSXZ4 23188 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19508 | CMAU7821682/CCLZ4 00956 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19509 | TCNU6849942/TSXZ41 9587 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19510 | TCLU8209952/GACZ40 5696 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19511 | TEMU8404787/TSXZ4 87653 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19512 | CAAU5010546/HDMZ 409221 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19513 | TCNU1999770/DCYZ4 41269 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19514 | BEAU5203775/TSXZ41 3831 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19515 | TXGU7238302/TSXZ48 3743 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19516 | TCKU7610578/HDMZ4 03446 | 08/25/2023 | 18 | 450.00 | 450.00 |

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DATE: 9/12/2023**TOTAL DUE:** \$80,731.25

| Date | Transaction Type | No. | Customer Ref # | Due Date | Past Due | Amount | Open Balance |
|------------|------------------|-------------|-----------------------------|------------|----------|----------|--------------|
| 08/10/2023 | Invoice | YFINV-19517 | NYKU4978395/FLKZ60 0541 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/10/2023 | Invoice | YFINV-19518 | TGCU5303009/TSXZ41 7318 | 08/25/2023 | 18 | 450.00 | 450.00 |
| 08/11/2023 | Invoice | YFINV-19519 | CMDUSGN1875748 | 08/26/2023 | 17 | 975.00 | 975.00 |
| 08/11/2023 | Invoice | YFINV-19520 | COSU6358908250 | 08/26/2023 | 17 | 1,325.00 | 1,325.00 |
| 08/14/2023 | Invoice | YFINV-19521 | CMDUSGN1875748 | 08/29/2023 | 14 | 450.00 | 450.00 |
| 08/15/2023 | Invoice | YFINV-19525 | MAEU228179682 | 08/30/2023 | 13 | 450.00 | 450.00 |
| 08/15/2023 | Invoice | YFINV-19526 | CMAU6449740 / MSCZ43877 | 08/30/2023 | 13 | 450.00 | 450.00 |
| 08/15/2023 | Invoice | YFINV-19523 | CMDUSGN1875748 | 08/30/2023 | 13 | 1,100.00 | 1,100.00 |
| 08/15/2023 | Invoice | YFINV-19524 | CMDUSGN1875748 | 08/30/2023 | 13 | 1,175.00 | 1,175.00 |
| 08/30/2023 | Invoice | YFINV-19558 | CMAU7856272 / FHCZ046695 | 08/30/2023 | 13 | 450.00 | 450.00 |
| 08/30/2023 | Invoice | YFINV-19559 | OOCU7432352 / NGLT900900 | 08/30/2023 | 13 | 450.00 | 450.00 |
| 08/30/2023 | Invoice | YFINV-19560 | HMMU6420551 / AIMZ843651 | 08/30/2023 | 13 | 450.00 | 450.00 |
| 08/30/2023 | Invoice | YFINV-19562 | COSU6360225460 | 08/30/2023 | 13 | 1,500.00 | 1,500.00 |
| 08/30/2023 | Invoice | YFINV-19563 | COSU6360225460 | 08/30/2023 | 13 | 2,425.00 | 2,425.00 |
| 08/16/2023 | Invoice | YFINV-19527 | CMDUSGN1875748 | 08/31/2023 | 12 | 1,000.00 | 1,000.00 |
| 08/17/2023 | Invoice | YFINV-19528 | UETU5177747 / TSXZ405128 | 09/01/2023 | 11 | 450.00 | 450.00 |
| 08/17/2023 | Invoice | YFINV-19536 | TCKU7341946/ FHCZ046408 | 09/01/2023 | 11 | 450.00 | 450.00 |
| 08/17/2023 | Invoice | YFINV-19537 | MRSU4095926 | 09/01/2023 | 11 | 450.00 | 450.00 |
| 08/17/2023 | Invoice | YFINV-19538 | SUDU5694243 / TSXZ555237 | 09/01/2023 | 11 | 450.00 | 450.00 |
| 08/17/2023 | Invoice | YFINV-19539 | TCKU6783075 / TSXZ436988 | 09/01/2023 | 11 | 450.00 | 450.00 |
| 08/17/2023 | Invoice | YFINV-19535 | COSU6360225460 | 09/01/2023 | 11 | 1,050.00 | 1,050.00 |
| 08/17/2023 | Invoice | YFINV-19529 | COSU6360225460 | 09/01/2023 | 11 | 1,075.00 | 1,075.00 |
| 08/17/2023 | Invoice | YFINV-19534 | COSU6360225460 | 09/01/2023 | 11 | 1,075.00 | 1,075.00 |
| 08/17/2023 | Invoice | YFINV-19530 | COSU6360225460 | 09/01/2023 | 11 | 1,100.00 | 1,100.00 |
| 08/17/2023 | Invoice | YFINV-19531 | COSU6360225460 | 09/01/2023 | 11 | 1,100.00 | 1,100.00 |
| 08/17/2023 | Invoice | YFINV-19532 | COSU6360225460 | 09/01/2023 | 11 | 1,100.00 | 1,100.00 |
| 08/17/2023 | Invoice | YFINV-19541 | COSU6360225460 | 09/01/2023 | 11 | 1,100.00 | 1,100.00 |
| 08/17/2023 | Invoice | YFINV-19542 | COSU6360225460 | 09/01/2023 | 11 | 1,100.00 | 1,100.00 |

YOU FIRST EXPRESS, INC.

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Statement

TO

Sarah Lund

Zariz Transport Inc.

7601 N Federal Hwy Ste 230B

Boca Raton, FL 33487-1668 USA

DATE: 9/12/2023**TOTAL DUE:** \$80,731.25

| Date | Transaction Type | No. | Customer Ref # | Due Date | Past Due | Amount | Open Balance |
|------------|------------------|-------------|----------------|------------|----------|----------|--------------|
| 08/17/2023 | Invoice | YFINV-19540 | COSU6360225460 | 09/01/2023 | 11 | 1,125.00 | 1,125.00 |
| 08/17/2023 | Invoice | YFINV-19544 | COSU6360225460 | 09/01/2023 | 11 | 1,150.00 | 1,150.00 |
| 08/17/2023 | Invoice | YFINV-19545 | COSU6360225460 | 09/01/2023 | 11 | 1,150.00 | 1,150.00 |
| 08/17/2023 | Invoice | YFINV-19546 | COSU6360225460 | 09/01/2023 | 11 | 1,150.00 | 1,150.00 |
| 08/17/2023 | Invoice | YFINV-19543 | COSU6360225460 | 09/01/2023 | 11 | 1,225.00 | 1,225.00 |
| 08/17/2023 | Invoice | YFINV-19547 | COSU6360225460 | 09/01/2023 | 11 | 1,225.00 | 1,225.00 |
| 08/17/2023 | Invoice | YFINV-19533 | COSU6360225460 | 09/01/2023 | 11 | 1,287.50 | 1,287.50 |
| 08/17/2023 | Invoice | YFINV-19548 | COSU6360225460 | 09/01/2023 | 11 | 1,325.00 | 1,325.00 |
| 08/17/2023 | Invoice | YFINV-19549 | COSU6360225460 | 09/01/2023 | 11 | 1,350.00 | 1,350.00 |
| 08/17/2023 | Invoice | YFINV-19550 | COSU6360225460 | 09/01/2023 | 11 | 1,525.00 | 1,525.00 |
| 08/17/2023 | Invoice | YFINV-19551 | COSU6360225460 | 09/01/2023 | 11 | 1,525.00 | 1,525.00 |
| 08/17/2023 | Invoice | YFINV-19552 | COSU6360225460 | 09/01/2023 | 11 | 1,525.00 | 1,525.00 |
| 08/17/2023 | Invoice | YFINV-19553 | COSU6360225460 | 09/01/2023 | 11 | 1,525.00 | 1,525.00 |
| 08/17/2023 | Invoice | YFINV-19554 | COSU6360225460 | 09/01/2023 | 11 | 1,725.00 | 1,725.00 |

| Current Due | 1-30 Days Past Due | 31-60 Days Past Due | 61-90 Days Past Due | 90+ Days Past Due | Amount Due |
|-------------|--------------------|---------------------|---------------------|-------------------|------------------|
| 0.00 | 77,656.25 | 3,075.00 | 0.00 | 0.00 | 80,731.25 |

Preferred Accepted Payment: Cash, Wire or ACH/Electronic Deposit.

Account Name: **You First Express, Inc**Bank Name: **JP Morgan Chase Bank, N.A**Account Number: **596388097**Direct Deposit/ACH Payment Routing No.: **322271627**Wire Transfer (Domestic) Routing No: **021000021**SWIFT Code: **CHASUS33** (if not enough digits, please add XXX at the end, ex: CHASUS33XXX)Bank Address: **2121 Torrance Blvd, Torrance, CA 90501**

Other Forms of Receiving Payment:

Zelle (Under \$5000), Credit Card (extra 4% fee), Check*

Please make a check payable to: **You First Express, Inc**NEW MAILING ADDRESS: **31244 Palos Verdes Dr. West Suite 203 Rancho Palos Verdes, CA 90275**

*May take 3-5 business days for check to clear.